NORGAARD O'BOYLE & HANNON 184 Grand Avenue Englewood, New Jersey 07631 Telephone Number (201) 871-1333 Facsimile Number (201) 871-3161 Attorneys for Debtor, Alexander Haselkorn By: Brian G. Hannon, Esq. BGH 3645

UNITED STATES BANKRUPTCY COURT

DISTRICT OF NEW JERSEY

NEWARK DIVISION

In re:

ALEXANDER HASELKORN Chapter 13

Case No. 19-32984

Debtor. :

HEARING DATE:

CERTIFICATION OF DEBTOR IN SUPPORT OF MOTION TO EXTEND THE AUTOMATIC STAY

ALEXANDER HASELKORN, of full age and having been duly sworn accordingly to law upon his oath, depose and says:

- 1. I am the Debtor in the above-captioned matter and make this Certification based on my personal knowledge.
- 2. I filed a previous Chapter 13 case that was dismissed during the past year and I make this certification in support of my motion seeking extension of the automatic stay regarding all creditors in the immediate case.
- 3. On February 27, 2018, I filed a Chapter 13 bankruptcy proceeding in the District of New Jersey (Newark) with the intent of trying to save my home, located at 785 Aspen Way, Franklin Lakes, New Jersey (the "Property") from foreclosure.

- 4. I began making trustee payments and my Chapter 13 plan was confirmed on March 18, 2019. I continued to perform under the terms of the plan but unfortunately, I defaulted on my trustee payments.
- 5. I was working as a physician during the pendency of my previous case. During the pendency of my previous case, I became involved in a dispute with my business partner that resulted in me incurring significant legal expenses and a significant reduction of income. That dispute has since been dismissed as to myself and I have been able to devote my attentions towards my work.
- 6. As a result, I have been able to begin producing income again and I no longer have the extreme expenses I was incurring as a result of the litigation.
- 7. Additionally, the plan in this case is significantly different than in my previous filing whereby I sought to save my home. Currently, my plan proposes a sale of my property so that I may retain my equity in same. This sale should result in a 100% payment of all claims filed by my creditors.
- 8. I will also be pursuing a potential lost wage claim that I have as a result of the above-mentioned litigation. I am hopeful that the claim is worth approximately \$100,000, as listed on my petition, and I am willing to contribute the necessary potion of any recovery to accomplish this 100% plan.
- 9. This Chapter 13 case has been filed in good faith. I have only had one previous case within the last year which was dismissed, and my Chapter 13 case was not dismissed for failure to file or amend the petition or any other documents required under the Bankruptcy Code.
- 10. I have not incurred any new debts since my last case was filed and my creditors were not adversely affected by my previous filing and dismissal.

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11. Additionally, I am filing this petition to permit the sale of my home and believe

that same is achievable through the Ch 13 plan that I have filed. Under the current Chapter 13

plan, I propose to pay all debts in full and therefore same is in the best interest of my estate and

all creditors.

12. Based on the above, it is respectfully requested that I be given an opportunity to

sell my Property in this Chapter 13 proceeding.

I hereby certify that the foregoing statements made by me are true. I am aware that if any

of the foregoing statements made by me are willfully false, I am subject to punishment.

By: ____/s/ Alexander Haselkorn

Dated: 12/12/19 Alexander Haselkorn